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UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Southwest Region
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October 4, 1999 F/SWR3:KCH

Mr. Peter Jacobsen
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Dear Mr. Jacobsen:

Thank you for the opportunity to comment on the proposed amendment to the project entitled, "Evaluation of increasing tagging levels for chinook salmon and steelhead and a demonstration project on mass marking." This project has two primary components:

1. A report that;
   a. compiles historical tagging data,
   b. uses models to determine the contribution of hatchery releases to marine fisheries, inland fisheries, and escapement, and
   c. uses the results of these analyses to assess;
      1) alternative approaches for a constant fractional marking program, and
      2) the feasibility of using such a program to improve fisheries management, including selective fisheries, and water management.
2. A demonstration project to build and deploy two mass marking machines to determine the feasibility of using new automated technology to achieve tagging goals.

The subjects of the proposed amendment to the contract are tasks 1a and 1b. Specifically, the applicant, Northwest Marine Technology, is seeking additional time and funding because of unexpected delays associated with error-checking and rectifying the tagging database, and to develop more comprehensive modeling tools that will enable more detailed exploration of tagging and recovery efforts and management scenarios.

The proposed amendment has merit for several reasons. 1) Proofing and correcting a database is a time-consuming, thankless, but essential task. The corrected database is a valuable asset and should be used to the fullest extent possible. 2) Fisheries and water management are contentious issues. Modeling that provides sufficient resolution to inform a scientific debate of the issues, rather than coarse results that merely inflame opinions,

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would have considerable value. The correspondence requesting the amendment, is not sufficiently detailed to allow me to determine how effectively the proposed additional modeling will inform the debate. The brief description provided, however, suggests that the broader range of scenarios to be modeled, and the additional effects to be examined, will yield a more informative product. 3) Because much of this new work will be done by a graduate student, the value to cost ratio could be very high. 4) The Restoration Coordination Program's 1999 package of projects recommended for funding included a project entitled, "Development of a comprehensive implementation plan for a statistically designed marking/tagging and recovery program for Central Valley hatchery-produced chinook salmon and steelhead." This project relies heavily upon the results of the Northwest Marine Technology proposal. Additional up-front modeling effort, at relatively low cost, has the potential to improve the structure and cost-effectiveness of the implementation plan.

I recommend that CalFed approve the proposed amendment to the Northwest Marine Technology proposal. I also suggest, as a condition of approving this amendment, that CalFed require the contractor to provide draft reports completed to date, and a detailed description of how additional modeling efforts will build upon the framework presented in the draft. CalFed should also impress upon the contractor that timely completion of the additional work is necessary to preserve the schedule of the recently funded project. These two projects can play an important role in informing management and improving future conditions for Central Valley salmonids, including three species listed under the state and federal Endangered Species Acts. The relevance and urgency of this work is further enhanced by the imminent return to the Central Valley of the first cohort of mass marked steelhead. Rapid completion of the proposed additional work should contribute to increasing the amount of information that can be obtained from this marking effort.

Sincerely,

Karl Halupka, Ph.D.
Fishery Biologist

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